Mr. Jon Hall
Standard Register Company
1251 North Fruitridge Avenue
Terre Haute, IN 47804

Re: 167-12294
Second Administrative Amendment to
FESOP 167-7790-00060

Dear Mr. Hall:

Standard Register Company was issued a permit on March 17, 1998 for a flexographic printing operation. A letter requesting an addition of a 5-color flexographic printing press was received on May 24, 2000. An additional request for an address change was received June 21, 2000. Pursuant to the provisions of 326 IAC 2-8-10(a)(2) and 326 IAC 2-8-10(a)(14), the permit is hereby administratively amended as follows:

(a) Standard Register Company requests the addition of a five (5) color flexographic printing press (press #24).

(b) Standard Register Company requests the mailing address be changed to match the location address, 1251 North Fruitridge Avenue, Terre Haute, Indiana 47804.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Darren Woodward, at (812) 462-3433, extension 15.

Sincerely,

George M. Needham
Director
Vigo County Air Pollution Control

Attachments
DKW
cc: Mindy Hahn
Winter Bottum

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
and
OFFICE OF AIR MANAGEMENT
and
Vigo County Air Pollution Control

Standard Register Company
1251 North Fruitridge Avenue
Terre Haute, Indiana 47804

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F167-7790-00060	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: March 17, 1998
First Administrative Amendment F167-11401	Issuance Date: October 14, 1999
Second Administrative Amendment F167-12294	Pages Affected: 4, 5, and 25
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: August 7, 2000

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a flexographic printing operation.

Responsible Official:	George Stubbs
Source Address:	1251 North Fruitridge, Terre Haute, Indiana 47804
Mailing Address:	Same as Source Address
SIC Code:	2761
County Location:	Vigo
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source, under Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

1. One (1) web press (Model MPDC108) which is identified as P4. This press was installed in 1981.

2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.

3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.

4. One (1) web press (Model 88-1232) which is identified as P21. This press was installed in 1994.

5. One (1) web press (Model 88-1242) which is identified as P20. This press was installed in 1990.

6. One (1) web press (Model 89-1241) which is identified as P18. This press was installed in 1990.

7. One (1) web press (Model 87-1225) which is identified as P16. This press was installed in 1989.

8. One (1) web press (Model 88-1234) which is identified as P17. This press was installed in 1989.

9. One (1) web press (Model 85-1637) which is identified as P15. This press was installed in 1987.

10. One (1) web press (Model 90-1255) which is identified as PB1. This press was installed in 1993.

11. One (1) web press (Model 390-4598) which is identified as PS1. This press was installed in 1996.

12. One (1) web press (Model 88-1233-D1) which is identified as P22. This press was installed in 1995.

13. One (1) web press (Model 92-1228) which is identified as P23. This press was installed in 1996.

14. One (1) web press (Model 85-1638) which is identified as P39. This press was installed in 1987.

15. One (1) web press (Model 2C108) which is identified as P2. This press was installed in 1978.

16. One (1) web press (Model 2C108) which is identified as P3. This press was installed in 1979.

17. One (1) web press which is identified as Pkluge. This press is only utilized for rewinding of printed roll stock. Therefore, it cannot be used in any capacity that would generate emissions.

18. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.

19. One (1) five (5) color flexographic printing press (Model Commander) which is identified as P24. This press was installed in 2000.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
(2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
(3) Paved and unpaved roads and parking lots with public access.
(4) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
NOTE: The CYREL plate processing unit is used to produce all of the Flexographic plates used at the facility. Production from this unit is 2 plates in 2.5 hours. The process is a closed loop operation in which the solvent (CYREL Washout Solution) is only exposed during installation and removal of a plate from the processor unit. The solvent is replenished continuously at a rate of 6.8 pounds/hour during operation and the used solvent is recycled. The actual solvent losses during processing amount to 4% by weight. These emissions are fugitive. Fugitive VOC emissions are 0.27 pounds/hour. The solvent is 75 wt% Perchloroethylene. Waste solvent is manifested for offsite disposal.

A conversation was held with an IDEM, OAM engineer who stated that Standard Register could receive credit for recycling and would have to count only the 4 wt% not recycled towards potential emissions.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION D.1 FACILITY OPERATION CONDITIONS

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2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.
3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.
4. One (1) web press (Model 88-1232) which is identified as P21. This press was installed in 1994.
5. One (1) web press (Model 88-1242) which is identified as P20. This press was installed in 1990.
6. One (1) web press (Model 89-1241) which is identified as P18. This press was installed in 1990.
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18. One (1) mobile Scitex Imaging Unit (Model 6240) which is identified as Scitex Mobile Unit #1.
19. **One (1) five (5) color flexographic printing press (Model Commander) which is identified as P24. This press was installed in 2000.**

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC)

That the VOC emissions from all the presses combined shall not exceed 99 tons per twelve (12) month consecutive period. Therefore, the requirements of 326 IAC 2-7, 326 IAC 8-5-5, and 326 IAC 8-6-1 do not apply.

D.1.2 VOC [326 IAC 8-1-6]

Any change or modification, except items 15 and 16, which may increase the potential emissions to 25 tons per year or more from the equipment listed above, would require prior approval from IDEM and VCAPC.

D.1.3 Hazardous Air Pollutants

That the hazardous air pollutant emissions from all the presses combined shall not exceed 9.0 tons per year for any single HAP and/or 24 tons per year for any combination of HAP's rolled monthly. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM and VCAPC reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Standard Register
1251 North Fruitridge Ave., Terre Haute, Indiana
167-12294-00060
Application Received: June 21, 2000
Reviewed by: Darren Woodward - VCAPC

VOC From Printing Press Operations

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN	MAXIMUM PRINT WIDTH (INCHE	MMin^2/YEAR
Press #24	500	18	56765

INK VOCS					
Ink Name Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles* Organics	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
Water Based Inks	2.2	13.5%	100.00%	56765	8.43
CF Coating	6.8	0.8%	100.00%	56765	1.54
Laser Lock	5.7	0.5%	100.00%	56765	0.81
Hot Melt Adhesive	85.6	0.0%	100.00%	56765	0.00
Press Wash	0.05	100.0%	100.00%	56765	1.42
Ammonia	0.2	0.0%	100.00%	56765	0.00
Scratch-off	0.22	50.0%	100.00%	56765	3.12

Total VOC = 1(Water Based Inks) + 4(Cratch-off @ 10%) + Solvents =

9.68	Ton/yr
53.03	lb/day
2.21	lb/hr

NOTE: It would be unrealistic to have every ink/coating to be considered a floodcoat, therefore, it was determined using the worst case, that one (1) floodcoat plus 10% of Scratch-off on the four (4) other towers, plus the solvents would be a realistic number.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

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